

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

United States of America)
Plaintiff)

v)

Jason M. Potter)
Defendant)

Defendant Jason Potter's MOTION FOR
DISCLOSURE OF COOPERATORS

Comes now Defendant Jason M. Potter
and for his motion states:

1. Defendant is currently incarcerated in the Bates County Jail, located at 6 W. Ft. Scott St. Butler, Mo. 64730
2. On information and belief, Defendant Jason M. Potter is at least some of the time incarcerated with "co-operators," who provide information or testimony or other services for state, local, or federal law enforcement agencies

or associates.

3. Defendant Jason M. Potter has exercised his right to speak to government officials and agents ONLY 1) by and through 6th Amendment counsel, or 2) in writing, based upon knowledge of the name, ID Number, current employment status, current job title, and disclosure of all government employment within the past 10 years.
4. It is well known that the government officials sometimes uses incarcerated persons to ask questions and gain admissions from criminal defendants or unindicted targets to whom the co-operator has access.
5. If defendant Jason M. Potter knows a or has good reason to believe that any person, whether or not incarcerated is a DE FACTO government agent or co-operator with any government agency, he will not speak with that person or in his presence or within earshot, except by and through counsel.

6. If a co-operator has access to defendant Jason Potter, that would give said co-operator plausible basis for testifying about things allegedly said by the defendant, whether or not such testimony might have any basis in fact.

7. Defendant Jason M. Potter claims and exercises his 5th Amendment right not to be a witness against himself in any criminal case unless and until advised to do otherwise by competent counsel

8. Being involuntarily forced to live in close quarters with co-operator carries a serious probability of being forced to live in close quarters with co-operator with false testimony, which may be utterly devastating, which may also render his 5th Amendment right not to be a witness against himself in a criminal case or nearly so.

9. Defendant Potter has an attorney available for such purposes who can speak with the government or its agents (whether formal or informal) at the direction of the defendant, conformably with defendant's directives and constitutional rights.

10. The government has multiple pods inmate housing units at defendant's place of confinement

11) The government can either move co-operators to a pod of their own choosing or else identify said co-operators to defendant Potter.

12) The government won't be prejudiced by being forced to disclose ALL co-operators, when and as they become known, or else promptly move said co-operators out of proximity with defendant Potter

13. A fact in this case is because a list of all co-operators or co-conspirators were not timely made known to the defendant

Jason M. Potter has suffered irreparable harm do to Conflicts of Interest; from court appointed attorneys who represented codefendants, Cooperators, or co-conspirators, who would likely be a witness against the defendant Jason M. Potter. causing unfair hearings and an unfair trial. Cooperator Daniel Gregg is one of them.

14) Defendant respectfully request the identification, names, of all cooperators, co-operators, ~~that the~~ and witnesses to prevent any conflicts of Interest, and to see if any currently exist. And the names and offices of these attorneys attached there of.

15) Defendant respectfully request the identification of all persons incarcerated with him who are cooperating with any government agency or cooperated within past 10 years

16. Defendant Jason M. Potter has no intention of committing any unlawful act against any co-operator. In fact, Defendant intends to exert every fiber of his being to enforce the Standards for Adult Correctional Institutions, 4th Edition (Standards, 4th Ed) and all other relevant legal authorities governing the care and treatment of prisoners, on behalf of co-operators confined in any jail or prison occupied by defendant.

17. This request is made for legitimate purposes.

WHEREFORE, Defendant Jason M Potter respectfully request an order that the government disclose to the said Defendant all cooperators whether formal or informal who have physical access to defendant while incarcerated, whether pretrial, post-trial, or otherwise and for such other and further relief as may be appropriate whether or not specifically requested.

By: Jason M. Potter 2/1/2022
Jason Potter
Bates County Detention
6 W. Ft. Scott
Butler, Mo. 64730

CERTIFICATE OF SERVICE PRISON MAILBOX RULE

Defendant by his signature above
pursuant to 28 USC 1746 declares
under penalty of perjury that on
the date set forth above he
placed a copy of this pleading
in the jail outgoing mail
receptacle with sufficient
1st class postage attached
addressed to the Clerk of
court for filing and service
via CM/ECF